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4 El Dorado, CA 95603  
5 Telephone: (530) 885-6244

6 Attorney for Defendant  
7 HEATHER ROMOSER

8  
9 IN THE UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA  
11

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 HEATHER ROMOSER,

16 Defendant

CASE NO. 2:21-CR-00110 KJM

**STIPULATION TO CONTINUE  
SENTENCING; ORDER**

17 Defendant HEATHER ROMOSER, by and through her counsel of record, TONI WHITE,  
18 and the GOVERNMENT, by and through Assistant United States Attorneys EMILY SAUVAGEAU  
19 and ROBERT ABENDROTH, hereby stipulate as follows:

20 1. By previous order, this matter was set for sentencing on March 24, 2025.

21 2. By this stipulation, defendant now moves to continue the sentencing to May 19, 2025.

22 The GOVERNMENT does not oppose this request.

23 3. The draft probation report was filed on March 6, 2025. Additional time is needed to  
24 complete the informal objection process so that a final report may be completed. More time will be  
25 needed for review of the final report, once completed, and preparation of sentencing briefing.  
26 Defendant also needs additional time to gather sentencing mitigation. Lastly, Ms. Romoser will be  
27 flying to sentencing from her home in Idaho. She needs to have enough time to change her plane and  
28 hotel reservation and reschedule.

1 4. The probation officer, Lynda Moore, is available and is in agreement with the disclosure  
2 schedule requested by the parties.

3 5. The parties request the following disclosure schedule:

4 Judgment and Sentencing Date: May 19, 2025

5 Reply, or Statement of Non-opposition: May 12, 2025

6 Motion for Correction of the Presentence Report shall be filed  
7 with the Court and served on the Probation Officer and opposing  
counsel no later than: May 5, 2025

8 The Pre-Sentence Report Shall be Filed with the Court and  
9 Disclosed to Counsel no Later Than: April 28, 2025

10 Counsel's Written Objections to the Pre-Sentence  
Report Shall be Delivered to the Probation Officer  
11 and Opposing Counsel no Later Than: April 21, 2025

12 The Proposed Pre-Sentence Report Has Been Disclosed  
to Counsel.

1 IT IS SO STIPULATED.

2 Dated: March 20, 2025

MICHELE BECKWITH  
Acting United States Attorney

3  
4 By: /s/ Emily Sauvageau  
5 EMILY SAUVAGEAU  
6 Assistant U.S. Attorney

7 For the United States

8 Dated: March 20, 2025

9 By: /s/ Robert Abendroth  
10 ROBERT ABENDROTH  
11 Assistant U.S. Attorney

12 For the United States

13 Dated: March 20, 2025

14 By: /s/ Toni White  
15 TONI WHITE  
16 For Defendant  
17 Heather Romoser

18 **ORDER**

19 Pursuant to the stipulation of the parties and good cause appearing, the sentencing hearing  
20 scheduled for March 24, 2025, is continued to May 19, 2025, at 9:30 a.m. and the PSR disclosure  
21 schedule and related dates proposed by the parties is adopted. **However, no further continuances of**  
22 **the of the sentencing hearing in this case will be granted absent a compelling showing of good**  
23 **cause.**

24  
25 IT IS SO ORDERED.

26 Dated: March 20, 2025

27 Dale A. Drozd  
28 DALE A. DROZD  
UNITED STATES DISTRICT JUDGE

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